State of California Department of I

Memorandum

Date: May 17, 2004

To: Marcia Laio
Office of Military Facilities
Department of Toxic Substances Control (DTSC), Region 2
700 Heinz Avenue, Suite 200
Berkeley, California 94710

From: Environmental Management Branch
P.O. Box 997413, MS 7405
1616 Capitol Avenue
Sacramento, California 95899-7413
(916) 449-5661

Subject: Review of the Revised Draft Installation Restoration Site 1 Radiological Survey work Plan, Revision 0, April 30, 2004, Alameda Point, Alameda, California; and Review of the Revised Draft Installation Restoration Site 2 Radiological Survey work Plan, Revision 0, April 30, 2004, Alameda Point, Alameda, California

Attached are the Department of Health Services' (DHS) comments on the subject document. This review was performed by Ms. Penny Leinwander, Associate Health Physicist in support of the Interagency Agreement between DTSC and DHS. If you have any questions concerning this report, or if you need additional information, please contact Ms. Leinwander (916) 449-5688.

Darice G. Bailey, Chief
Waste Management Section

Attachment

cc: Ms. Claudia Domingo
Dept. of the Navy
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

Mr. Matt Slack

Department of Health Services Review

Activity: Review of the Revised Draft Installation Restoration Site 1 Radiological Survey work Plan, Revision 0, April 30, 2004, Alameda Point, Alameda, California; and Review of the Revised Draft Installation Restoration Site 2 Radiological Survey work Plan, Revision 0, April 30, 2004, Alameda Point, Alameda, California

Specific Comments:

1. Site 1, page 1-1, Section 1.0: As previously mentioned in other DHS comments, the last radiological survey of Site 1 found an anomalous location at the very edge of the surveyed area. It is not clear if the boundary for Site 1 is appropriately located. Therefore, DHS would request that surveys on the eastern boundary follow a step-out procedure beyond the current boundary to ensure that all discrete sources from the disposal pits have been identified.

2. Site 1, Section 5.4, Page 5-2 & Site 2, Section 5.4, Page 5-1: The second paragraph indicates that one objective of the survey is to determine "a concentration level that is deemed indistinguishable from background (IFB)." NUREG-1505 provides methods to determine if a survey unit is IFB, where some results may be higher than a specific concentration level. The NUREG-1505 method does not compare each individual result against a fixed concentration level and instead uses the Wilcox Rank Sum (WRS) test, however, this is not a final status survey so the WRS test does not need to be used.

3. Site 1, Page 2-5, 3rd paragraph: This section indicates that radionuclides were detected in the first water bearing zone. Were these detections due to contamination or from fallout and naturally occurring radioactive materials (NORM)?

4. Site 1, Page 2-6: Based on a review of our records, it does not appear that the elevated exposure rate location in the burn pit area has been documented as to the nuclides of concern. The US EPA at one point had taken a portable MCA to the location and identified radium as the contaminant, however, the results were never published. DHS therefore requests that special emphasis (require biased sampling and in situ measurements) be placed on characterization of this burn pit area and the purported radwaste disposal trench mentioned on Page 2-6. It is not clear from the information provided whether the disposal trench located near the rifle range is the same location as the elevated exposure rate location in the burn pit area. Any results that could clarify this issue would be helpful. In addition, ground penetrating radar or other investigation techniques could be useful in defining the boundaries of any disposal pits.